

I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
nchatterjee@orrick.com  
MONTE M.F. COOPER (STATE BAR NO. 196746)  
mcooper@orrick.com  
THERESA A. SUTTON (STATE BAR NO. 211857)  
tsutton@orrick.com  
MORVARID METANAT (STATE BAR NO. 268228)  
mmetanat@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
Menlo Park, CA 94025  
Telephone: 650-614-7400  
Facsimile: 650-614-7401

Attorneys for Plaintiff  
FACEBOOK, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FACEBOOK, INC.,

Plaintiff,

v.

POWER VENTURES, INC. a Cayman Island  
Corporation; STEVE VACHANI, an  
individual; DOE 1, d/b/a POWER.COM,  
DOES 2-25, inclusive,

Defendants.

Case No. 5:08-cv-05780 JW

**ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL CERTAIN  
PORTIONS OF FACEBOOK, INC.'S  
REPLY IN SUPPORT OF MOTION  
TO COMPEL DEFENDANTS TO  
PERFORM THOROUGH SEARCH  
FOR RESPONSIVE DOCUMENTS  
AND THE PRODUCTION THEREOF  
AND EXHIBITS S-Y IN SUPPORT  
THEREOF.**

Judge: Hon. James Ware  
Courtroom: 15, 18th Floor

Pursuant to Local Rules 7-11 and 79-5(d), Plaintiff Facebook, Inc. submits this Administrative Motion to file under seal: 1) portions of Facebook's Reply in Support of Motion to Compel Defendants to Perform Thorough Search for Responsive Documents and for Production Thereof; and 2) **Exhibits S-Y** attached to the Declaration of Movarid Metanat In Support of Facebook's Reply in Support of Motion to Compel Defendants to Perform Thorough Search for Responsive Documents and for Production Thereof.

The following Exhibits, attached to the Declaration of Movarid Metanat, have been designated as "Highly Confidential-Attorneys' Eyes Only" pursuant to the parties' February 4, 2011 Protective Order (Dkt. No. 95):

- **Exhibit S-Y**—These documents have been produced by Third-Party Ed Niehaus. Mr. Niehaus has designated these documents as "Highly Confidential-Attorneys' eyes only" in accordance with the parties' Protective Order.

The Motion includes references to the above documents designated as confidential by Mr. Niehaus. Facebook is lodging with the Clerk a copy of the under seal documents and filing a redacted version of Facebook's Reply in Support of Motion to Compel Defendants to Perform Thorough Search for Responsive Documents and for Production Thereof, so that public access to non-confidential materials will be provided.

Dated: September 13, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

*/s/ Morvarid Metanat*  
 MORVARID METANAT  
 Attorneys for Plaintiff  
 FACEBOOK, INC.